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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

A.M., an individual,

Plaintiff,

vs.

OMEGLE.COM LLC,

Defendant.

Case No. 3:21-CV-01674-MO

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO COMPLETE
FACT DISCOVERY AND FILE
DISPOSITIVE MOTIONS**

LR 7-1 CERTIFICATION

Counsel for Defendant Omegle.com LLC (“Defendant”) certifies that she conferred with Plaintiff’s counsel, and that Plaintiff does not oppose this motion.

MOTION

Defendant moves the Court to extend the deadlines to complete fact discovery and file dispositive motions as follows:

Deadline	Current Date	Proposed Date
Complete Fact Discovery	October 30, 2023	November 30, 2023
Dispositive Motions Deadline	November 29, 2023	December 29, 2023

The additional 30 days will allow parties to pursue mediation ahead of the close of fact discovery. The parties have worked together to effectively use the time provided under the current scheduling order, including Defendant's production of more than 37,000 documents. This is the second motion for extension of time filed in relation to these deadlines. The extension request is made in good faith and will not affect other deadlines in the case.

DATED this 25th day of September, 2023.

SNELL & WILMER L.L.P.

/s/ Lea K. Schneider

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